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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY: DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 0024

UNITED STATES OF AMERICA, Plaintiff, v. TABORA-Paz, Hector And THEODOROPOLOUS, Alexandros	**Mag. Case Number:** ________ COMPLAINT FOR VIOLATION OF Title 21, U.S.C., Sections 952 and 960 Importation of a Controlled Substance

The undersigned complaint being duly sworn states:

On or about January 3, 2008, within the Southern District of California, Hector TABORA-Paz and Alexandros THEODOROPOLOUS, did knowingly and intentionally import approximately 4.0 kilograms of cocaine, a schedule II narcotic, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT
SPECIAL AGENT
U.S. IMMIGRATION & CUSTOMS ENFORCEMENT

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 4th DAY OF Jan, 2008.

MAGISTRATE JUDGE

CATHY ANN BENCIVENGO
U.S. MAGISTRATE JUDGE

United States of America
VS.
Hector TABORA-Paz
and
Alexandros THEODOROPOLOUS

PROBABLE CAUSE STATEMENT

On January 3, 2008 at approximately 3:35 p.m., Ruben Sonnie MARTINEZ (later identified as Hector TABORA-Paz, AKA: Hector TAURA-Paz) and Alexandros THEODOROPOULOS attempted to enter the United States from Mexico through the San Ysidro, California, Port of Entry. TABORA-Paz was the driver, and THEODOROPOULOS was the passenger on a yellow and black 2003 Suzuki GSX-R750 Motorcycle bearing no license plate.

On January 3, 2008, Customs and Border Protection Officers (CBPO) received two negative Customs Declarations from TABORA-Paz in the vehicle primary lanes. TABORA-Paz was accompanied by THEODOROPOULOS. A CBP Officer noticed that there was one key on the key ring used in the ignition, the motorcycle was clean around the gas tank area, and the two men were wearing semi-casual clothing. The CBPO Officer requested a CBP Canine Enforcement Officer screen the motorcycle with a Narcotic/Human Detector Dog. The Narcotic/Human Detector Dog alerted to the presence of a narcotic odor emitting from the vehicle. The vehicle was referred to the secondary inspection area for further inspection

Further examination of the vehicle revealed 3 packages totaling 4.0 kilograms of a white powdery substance concealed in the air intake box. A random field test of one of the packages revealed a positive reaction for cocaine.

On January 3, 2008, at approximately 5:30 p.m., TABORA-Paz waived his constitutional rights, as per Miranda, and stated that THEODOROPOULOS was going to pay him $900.00 to drive the Suzuki Motorcycle loaded with what he believed to be marijuana from Mexico into the United States.

TABORA-Paz and THEODOROPOULOS were arrested and charged with violation of Title 21 USC 952, 960, Importation of a Controlled Substance, and were booked into the Metropolitan Correctional Center, San Diego, CA.